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**INVOICE/STATEMENT OF
SERVICES**

December 8, 2020

Invoice Number: 4822

Matter Name: Artiles v Superior Apts

Period: 6/1/2019 through 12/8/2020

ATTORNEY SERVICES

Professional Services by Marc A. Rapaport

		<u>Hrs/Rate</u>	<u>Amount</u>
<u>Karina Gulfo</u>			
2/29/2020	Karina Gulfo		
	Pleadings L210 Proofread, edit and add fact allegations to complaint; draft summonses and civil cover sheet; edits of documents; filings on ECF	3.50 95.00/hr	332.50
3/3/2020	Karina Gulfo		
	Manage data/files A110 Prepare summonses and complaint copies for process server; draft letter to process server	1.10 95.00/hr	104.50
4/1/2020	Karina Gulfo		
	Communicate (other external A108 Add MR signature to stip; send same to depts' counsel	0.12 95.00/hr	11.08
4/3/2020	Karina Gulfo		
	Manage data/files A110 Review order; calendar deadline	0.07 95.00/hr	6.33

			<u>Hrs/Rate</u>	<u>Page 2 Amount</u>
7/7/2020	Karina Gulfo	Communicate (other external A108 Review, edit and email First notice to admit to depts' counsel	0.43 95.00/hr	41.17
	Karina Gulfo	Draft/revise A103 Edits to damages calculations and to notices to admit	1.17 95.00/hr	110.83
7/8/2020	Karina Gulfo	Communicate (with client) A106 Call with MR and client	0.33 95.00/hr	31.67
	Karina Gulfo	Discovery L300 Attention to production	1.00 95.00/hr	95.00
	Karina Gulfo	Draft/revise A103 Review of client file; edits to damages chart	1.50 95.00/hr	142.50
7/10/2020	Karina Gulfo	Communicate (with client) A106 Call with Mr. Artilles re. [REDACTED]; email re. same to MR	0.13 95.00/hr	12.67
7/16/2020	Karina Gulfo	Discovery L300 Revision to damage calculations	0.17 95.00/hr	15.83
7/22/2020	Karina Gulfo	Draft/revise A103 Prepare documents and letter to depts' counsel pursuant to court order	2.00 95.00/hr	190.00
7/23/2020	Karina Gulfo	Communicate (with client) A106 Call with client	0.17 95.00/hr	15.83
7/24/2020	Karina Gulfo	Document Production L320 Create index of plaintiff's production	0.25 95.00/hr	23.75

			<u>Hrs/Rate</u>	<u>Page 3 Amount</u>
7/24/2020	Karina Gulfo	Draft/revise A103 Attention to production and edit to letter for defts' counsel; email to MR re. same	2.00 95.00/hr	190.00
8/17/2020	Karina Gulfo	Communicate (with client) A106 Call with client and Mr. Ramirez; translate for MR	0.50 95.00/hr	47.50
8/18/2020	Karina Gulfo	Communicate (with client) A106 Translate for MR during call with client	0.60 95.00/hr	57.00
	Karina Gulfo	Document Production L320 Produce further pages to defts' via email	0.25 95.00/hr	23.75
8/20/2020	Karina Gulfo	Communicate (other external A108 Translate call for MR with ex co-worker of client, Mr. Ramirez	0.50 95.00/hr	47.50
	Karina Gulfo	Communicate (with client) A106 Call with client and email same to MR	0.17 95.00/hr	15.83
	Karina Gulfo	Communicate (other external A108 Make arrangements for remote interpreter for upcoming mediation	0.13 95.00/hr	12.67
	Karina Gulfo	Communicate (other external A108 Revise, edit and translate witness declaration; meeting with Arturo Ramirez (with MR)	1.15 95.00/hr	109.25
8/21/2020	Karina Gulfo	Document Production L320 Prepare and produce further document production to defts' counsel	1.17 95.00/hr	110.83

			<u>Hrs/Rate</u>	<u>Page 4 Amount</u>
8/25/2020	Karina Gulfo	Document Production L320 Prepare and produce Plaintiff's further document production (P0075 - P0081) to defts' counsel	0.30 95.00/hr	28.50
8/27/2020	Karina Gulfo	Communicate (with client) A106 Call with client and MR	0.33 95.00/hr	31.67
9/1/2020	Karina Gulfo	Activities A100 Email to interpreter and texts with client	0.25 95.00/hr	23.75
9/3/2020	Karina Gulfo	Activities A100 Send signed confid. agreement from interp. to mediator	0.10 95.00/hr	9.50
9/10/2020	Karina Gulfo	Activities A100 Call with client; email re. same to MR; send message from Mr. Marcus to MR	0.13 95.00/hr	12.67
9/14/2020	Karina Gulfo	Draft/revise A103 Proofread and edits to plaintiff's responses and objections to defendants demands to produce; e-mail re. same to MR	3.00 95.00/hr	285.00
	Karina Gulfo	Discovery L300 Phone calls with MR re. revisions to plaintiff's answers to rogs and demands to produce; final proofread of same and e-mail to defts' counsel	2.00 95.00/hr	190.00
10/30/2020	Karina Gulfo	Communicate (with client) A106 call with client; explained [REDACTED] [REDACTED] [REDACTED] MR sent	0.50 95.00/hr	47.50

			Hrs/Rate	Page 5 Amount
message to depts' counsel re. tools; mailed agreement and W9 to client; he [REDACTED]				
10/30/2020	Karina Gulfo	Activities A100 Telephone call with Mr. Artiles; email to Mr. Marcus; explain [REDACTED] to Mr. Artiles with Ms. Gulfo as interpreter	0.50 95.00/hr	47.50
12/4/2020	Karina Gulfo	Activities A100 Proofread and edits to Cheeks letter; settlement agreement and draft of notice of consent to proceed under Magistrate Judge	2.00 95.00/hr	190.00
12/7/2020	Karina Gulfo	Activities A100 Further attention to Cheeks submission; review/organize exhibits to same; review Iodestar/history bill; meeting with MR	2.50 95.00/hr	237.50
12/8/2020	Karina Gulfo	Communicate (other external A108 Attention to Cheeks application	0.40 400.00/hr	160.00
SUBTOTAL:			[30.42	3,011.58]
<u>Marc Rapaport</u>				
1/25/2020	Marc Rapaport	Analysis/Strategy L120 Meeting with Mr. Artiles; review background; prepare retainer agreement (M. Cabezas as interpreter)	1.50 400.00/hr	600.00
2/14/2020	Marc Rapaport	Pleadings L210 Review background information and documents	2.50 400.00/hr	1,000.00

			<u>Hrs/Rate</u>	<u>Page 6 Amount</u>
		provided by Mr. Artiles; begin drafting complaint		
3/30/2020	Marc Rapaport	Activities A100 Emails with defs' counsel re: waiver of service; extension of time	0.20 400.00/hr	80.00
5/20/2020	Marc Rapaport	Activities A100 Receive and review scheduling order	0.10 400.00/hr	40.00
7/6/2020	Marc Rapaport	Draft/revise A103 draft notice to admit; send same to K. Gulfo for proofreading and edits; review client's documents; attention to initial discovery requirements per court order	2.00 400.00/hr	800.00
7/8/2020	Marc Rapaport	Activities A100 Email to Mr. Marcus	0.10 400.00/hr	40.00
7/24/2020	Marc Rapaport	Activities A100 Review and edit damages chart	1.20 400.00/hr	480.00
8/17/2020	Marc Rapaport	Communicate (with client) A106 Multiple telephone calls with Mr. Artiles with KG as interpreter	0.60 400.00/hr	240.00
8/18/2020	Marc Rapaport	Communicate (with client) A106 Call with client and K. Gulfo	0.60 400.00/hr	240.00
8/20/2020	Marc Rapaport	Activities A100 Meeting with witness Ramirez (prior employee of defendants); draft affidavit and obtain witness' signature	1.60 400.00/hr	640.00

			<u>Hrs/Rate</u>	<u>Page 7 Amount</u>
8/26/2020	Marc Rapaport	Discovery L300 Attention to discovery responses; multiple meetings/comm's with KG re same	2.00 400.00/hr	800.00
8/27/2020	Marc Rapaport	Communicate (with client) A106 Call with client	0.33 400.00/hr	133.33
8/31/2020	Marc Rapaport	Activities A100 Pre-mediation telephone call with mediator; review background documents and pleadings in connection with same	0.70 400.00/hr	280.00
9/1/2020	Marc Rapaport	Communicate (other external A108 Email comm's with defendants' counsel, Marcus	0.20 400.00/hr	80.00
	Marc Rapaport	Activities A100 Telephone calls with Mr. Artiles; discussions with Mr. Artiles re: [REDACTED] [REDACTED]	0.60 400.00/hr	240.00
9/2/2020	Marc Rapaport	Activities A100 Emails with defendants counsel re: apartment credit/housing allowance issue; research NY Wage Order for Bldg Service Industry	0.70 400.00/hr	280.00
	Marc Rapaport	Activities A100 Telephone calls with Mr. Artiles (KG as interpreter)	0.50 400.00/hr	200.00
	Marc Rapaport	Activities A100 Meeting in office with Mr. Artiles [REDACTED] [REDACTED]	1.00 400.00/hr	400.00

			<u>Hrs/Rate</u>	<u>Page 8 Amount</u>
9/2/2020	Marc Rapaport	Communicate (other external A108 Telephone call with witness (JA as interpreter)	0.13 400.00/hr	53.33
9/3/2020	Marc Rapaport	Plan and Prepare for A101 Morning preparation for mediation; review our damages calculations/chart; mediation statement and disclosures from each side	1.00 400.00/hr	400.00
	Marc Rapaport	Appear for/attend A109 Full-day Zoom mediation; discussions with client [REDACTED] [REDACTED]	6.00 400.00/hr	2,400.00
9/14/2020	Marc Rapaport	Discovery L300 Draft responses to Defendants' discovery demands	2.50 400.00/hr	1,000.00
	Marc Rapaport	Activities A100 Telephone call with witness (prior superintendent of defendants) (with KG as interpreter)	0.37 400.00/hr	146.67
9/15/2020	Marc Rapaport	Discovery L300 Draft discovery demands to defendants, including Interrogatories and Document Demands	2.00 400.00/hr	800.00
9/29/2020	Marc Rapaport	Activities A100 Telephone call with Mr. Marcus regarding settlement-related issues	0.20 400.00/hr	80.00
10/8/2020	Marc Rapaport	Communicate (with client) A106 Telephone call with Mr. Artiles regarding: [REDACTED]	0.40 400.00/hr	160.00

			<u>Hrs/Rate</u>	<u>Page 9 Amount</u>
				
10/20/2020	Marc Rapaport	Settlement/Non-Binding ADR L160 Receive proposed settlement agreement; initial review of same	0.50 400.00/hr	200.00
10/23/2020	Marc Rapaport	Activities A100 Email with Joshua Marcus, Esq. re settlement issues	0.10 400.00/hr	40.00
10/26/2020	Marc Rapaport	Negotiation/Revision/Respon P500 Multiple emails with Joshua Marcus, Esq. re: settlement	0.40 400.00/hr	160.00
10/27/2020	Marc Rapaport	Activities A100 Extensive revisions to settlement agreement; begin draft of Cheeks application for approval of settlement agreement	2.50 400.00/hr	1,000.00
10/30/2020	Marc Rapaport	Activities A100 Email to Joshua Marcus re settlement-related issues	0.20 400.00/hr	80.00
11/3/2020	Marc Rapaport	Activities A100 Meeting with client in office; explain 	1.00 400.00/hr	400.00
11/16/2020	Marc Rapaport	Communicate (with client) A106 Telephone call with Mr. Artiles (KG as interpreter)	0.30 400.00/hr	120.00
11/30/2020	Marc Rapaport	Activities A100 Emails with Mr. Marcus regarding tools left behind by client; review photographs from Mr. Marcus	0.13 400.00/hr	53.33

			Hrs/Rate	Page 10 Amount
12/1/2020	Marc Rapaport	Communicate (other external A108 Email comm's with defendants' counsel regarding issues pertaining to Plaintiffs' tools	0.40 400.00/hr	160.00
12/2/2020	Marc Rapaport	Activities A100 Attention to settlement and Cheeks related documents; revisions to apportionment of settlement per telephone call yesterday with client; review/revise Cheeks letter for approval of settlement agreement; attention to lodestar/history bill	2.00 400.00/hr	800.00
12/3/2020	Marc Rapaport	Draft/revise A103 Make substantial edits to Cheeks application letter; attention to lodestar/history bill	2.10 400.00/hr	840.00
12/4/2020	Marc Rapaport	Activities A100 Review KG's edits to Cheeks letter; review lodestar calculations in light of additional time	0.50 400.00/hr	200.00
12/8/2020	Marc Rapaport	Activities A100 Emails with Mr. Marcus re: Cheeks submission	0.20 400.00/hr	80.00
SUBTOTAL:			[39.36	15,746.66]
<u>Marcela Cabezas</u>				
1/25/2020	Marcela Cabezas	Activities A100 Assist/interpret at client meeting; explain retainer agreement to Mr. Ariles	2.00 115.00/hr	230.00

		Hrs/Rate	Page 11 Amount
2/5/2020	Marcela Cabezas	Communicate (with client) A106 Text communications and telephone calls with client; discussions with MR re. same	0.30 115.00/hr 34.50
2/8/2020	Marcela Cabezas	Activities A100 Extensive meeting with client; review and organize documents brought by client relating to his claims	2.00 115.00/hr 230.00
2/13/2020	Marcela Cabezas	Communicate (with client) A106 Further meeting with client; collect documents; email to MR and Karina re. same	1.58 115.00/hr 182.08

SUBTOTAL:

[5.88 676.58]

Total Amount Due for this Period

75.66 \$19,434.82

Additional Charges :

Karina Gulfo

2/29/2020 Filing Fee SDNY
Court Fees
E112 400.00

3/3/2020 NY Sec of State fee for
service on corporate defts
Delivery services/messengers
E107 560.00

Pacer Fees
Court Fees
E112 1.50

in-house copies at .10 per
page
Copying
E101 45.00

		Page 12 <u>Amount</u>
3/10/2020	Gotham Process Service Fee - Nassau County Service Private investigators E120	75.00
3/11/2020	Gotham Process Service Fee Private investigators E120	585.00
3/13/2020	Gotham Process Service Fee Delivery services/messengers E107	50.00
3/14/2020	Gotham Process Service Fee - Nassau County Service Delivery services/messengers E107	75.00
6/1/2020	Pacer court document access fee. Court Fees E112	2.00
6/3/2020	Pacer court document access fee. Court Fees E112	1.50
7/22/2020	Pacer fees Court Fees E112	0.80
7/23/2020	in-house copies at .25 per pages Copying E101	11.50
7/24/2020	USPS Mailing of documents to defts' counsel Delivery services/messengers E107	7.50
8/18/2020	Pacer fees Court Fees E112	2.20
8/27/2020	Pacer fees Copying E101	1.50

			Page 13 <u>Amount</u>
	8/27/2020	Pacer fees Copying E101	2.70
	9/11/2020	Court Fees E112	1.00
	9/23/2020	Payment for Interpreter services from Magna Legal at Zoom mediation submitted Other professionals E123	1,280.00
SUBTOTAL:			<u>[3,102.20]</u>
<u>Marc Rapaport</u>			
	2/14/2020	in-house copies at 0.25 per page Copying E101	5.25
	7/6/2020	Pacer fees Court Fees E112	0.80
	10/27/2020	In-house copies at 0.25 per page Copying E101	3.00
SUBTOTAL:			<u>[9.05]</u>
<u>Marcela Cabezas</u>			
	2/8/2020	In-house copies at 0.25 per page Copying E101	11.10
SUBTOTAL:			<u>[11.10]</u>
Total additional charges			<u>\$3,122.35</u>
Total amount of this bill			<u><u>\$22,557.17</u></u>